

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Kevin Khottavongsa,
As Trustee for the Heirs
and Next of Kin of
Sinthanouxay Khottavongsa,

Plaintiff,

v.

City of Brooklyn Center, Police Officers
Alan Salvosa, Cody Turner, and Gregg
Nordby, acting in their individual
capacities as City of Brooklyn Center
police officers,

Defendants.

Court File No. 16-cv-1031 RHK/DTS

**DECLARATION OF JOSHUA A.
RISSMAN IN OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

I, JOSHUA J. RISSMAN, declare under penalty of perjury pursuant to 28 U.S.C.
§ 1746 that the following is true and correct:

My name is Joshua J. Rissman. I am one of the attorneys representing Kevin Khottavongsa in the above-referenced matter and submit this Declaration in opposition of Defendants' Motion for Summary Judgment. The facts stated herein are based on my own personal knowledge.

1. Attached as Exhibit A is the deposition transcript of Randall Jackson.
2. Attached as Exhibit B is the deposition transcript of Maria Cruz-Martinez.
3. Attached as Exhibit C is the deposition transcript of Taing Hong.
4. Attached as Exhibit D is the declaration of Leang Sarin.

5. Attached as Exhibit E is the deposition transcript of Leang Sarin.
6. Attached as Exhibit F is the deposition transcript of Kear Som
7. Attached as Exhibit G is the 911 Transcript.
8. Attached as Exhibit H is the deposition transcript of Michael Coleman
9. Attached as Exhibit I is the Memorandum of Law in Support of Plaintiff's

Motion to exclude the testimony of Dr. Uzma Samadani.

10. Attached as Exhibit J is Officer Cody Turner's dashcam video.
11. Attached as Exhibit K is the deposition transcript of Cadet Jose Nochez.
12. Attached as Exhibit L is the deposition transcript of Officer Alan Salvosa.
13. Attached as Exhibit M is Officer Alan Salvosa's deposition Exhibit 5.
14. Attached as Exhibit N is Officer Alan Salvosa's dashcam video.
15. Attached as Exhibit O is the deposition transcript of Kevin Khottavongsa.
16. Attached as Exhibit P is Khottavongsa_00106.
17. Attached as Exhibit Q is the deposition transcript of Mohamed Elmi.
18. Attached as Exhibit R is the deposition transcript of Guadalupe Galarza.
19. Attached as Exhibit S is Charles Drago's Expert Report.
20. Attached as Exhibit T is the deposition transcript of Officer Cody Turner.
21. Attached as Exhibit U is Brooklyn Center 30(b)(6) deposition transcript.
22. Attached as Exhibit V is Brooklyn Center 30(b)(6) deposition transcript

Exhibit 10, Brooklyn Center 0747.

23. Attached as Exhibit W is Exhibit 1 to Officer Alan Salvosa's deposition.
24. Attached as Exhibit X is Exhibit 11 to Brooklyn Center 30(b)(d) deposition.

25. Attached as Exhibit Y is Officer Kate Deering dashcam video.
26. Attached as Exhibit Z is the deposition transcript of Officer Joshua Whittenburg.
27. Attached as Exhibit AA is Officer Alan Salvosa deposition exhibit 3.
28. Attached as Exhibit BB is Officer Alan Salvosa deposition exhibit 9.
29. Attached as Exhibit CC is Officer Alan Salvosa's dashcam video.
30. Attached as Exhibit DD is the deposition transcript of Linda Miller.
31. Attached as Exhibit EE is the deposition transcript of Officer Kate Deering.
32. Attached as Exhibit FF is the CAD Report.
33. Attached as Exhibit GG is Cadet Jose Nochez deposition exhibit 1.
34. Attached as Exhibit HH is the Critical Incident Review Findings.
35. Attached as Exhibit II is Plaintiff's First Set of Interrogatories to Officer Alan Salvosa.
36. Attached as Exhibit JJ is Officer Alan Salvosa's Performance Evaluation, Salvosa's Deposition Exhibit 11.

Dated: July 31, 2017

s/Joshua J. Rissman